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10 *Attorneys for Defendants*

11 [Additional Counsel Listed On Next Page]

12 **UNITED STATES DISTRICT COURT**
13 **EASTERN DISTRICT OF WASHINGTON**

14 JUSTIN BAKER, on behalf of himself
and all others similarly situated,

15 Plaintiff,

16 v.

17 UNITED PARCEL SERVICE, INC., a
Delaware corporation, and UNITED
18 PARCEL SERVICE, INC., an Ohio
corporation,

19 Defendants.
20
21

NO. 2:21-cv-00114-TOR

**DEFENDANTS' MOTION FOR
ADMISSION *PRO HAC VICE* OF
JACOB DEAN**

MOTION FOR ADMISSION *PRO HAC VICE* OF JACOB DEAN

1 NAOMI G. BEER (CO Bar No. 29144)

Admitted Pro Hac Vice

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1 The undersigned counsel hereby moves this Court, pursuant to Local Rule 83.2 of
2 the United States District Court for the Eastern District of Washington, for an Order
3 allowing the *pro hac vice* admission of Jacob Dean as counsel for Defendants in the above-
4 captioned action. As grounds for the motion, the undersigned states as follows:

5 1. Jacob Dean is an associate with the law firm of Greenberg Traurig, LLP,
6 Terminus 200, 3333 Piedmont Road NE, Suite 2500, Atlanta, Georgia 30305.

7 2. Jacob Dean is a member in good standing of the bars of the State of Georgia
8 (Bar No. 180545, admitted November 20, 2019) and Alabama (Bar No. 1552J10P,
9 admitted October 3, 2017). He is admitted to practice before the United States District
10 Court for the Northern District of Alabama (admitted August 15, 2022), the United States
11 District Court for the Southern District of Georgia (admitted May 26, 2021), the Supreme
12 Court of Georgia (admitted May 26, 2021), the Georgia Court of Appeals (admitted May
13 26, 2021), the United States District Court for the Southern District of Alabama (admitted
14 February 27, 2020), the United States District Court for the Northern District of Georgia
15 (admitted July 2, 2020), the United States District Court for the Middle District of Georgia
16 (admitted February 4, 2020), and the United States District Court for the Western District
17 of Michigan (admitted February 24, 2020).

18 3. There are no disciplinary proceedings pending against Jacob Dean in any state
19 or federal court.

20 4. Pursuant to Local Rule 83.2(c)(3)(C), for purposes of litigating this action,
21 Mr. Dean will be associated with the undersigned counsel.

1 5. Pursuant to Local Rule 83.2(c)(3)(D), the necessity for the appearance of Mr.
 2 Dean in this litigation is his experience litigating employment class action cases in federal
 3 courts. Defendants United Parcel Service, Inc., a Delaware corporation, and United Parcel
 4 Service, Inc., an Ohio corporation (together, “UPS” or “Defendants”), have been sued in a
 5 related individual-plaintiff action (2:21-cv-00162-TOR). As such, UPS prefers
 6 coordination of the various issues in this case with the individual-plaintiff action case
 7 through some common counsel and expects that will prove to increase efficiency in the
 8 administration of this case. Mr. Dean’s experience includes litigating cases involving the
 9 Uniformed Services Employment and Reemployment Rights Act, and his experience will
 10 benefit co-counsel.

11 WHEREFORE, the undersigned counsel respectfully moves that Jacob Dean be
 12 admitted to practice *pro hac vice* before this Court.

13 Dated: June 19, 2023

**JEFFERS, DANIELSON, SONN &
 AYLWARD, P.S.**

/s/ Sally W. Harmeling
 Sally W. Harmeling

Attorney for Defendants

UNITED PARCEL SERVICE, INC., a
 Delaware corporation, and UNITED
 PARCEL SERVICE, INC., an Ohio
 corporation,

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CERTIFICATE OF SERVICE

The undersigned certifies that, on June 19, 2023, a true and correct copy of Defendant's Motion For Admission *Pro Hac Vice* of Jacob Dean, was served on all counsel of record by the Court's electronic filing system (CM/ECF).

By: /s/ Sally W. Harmeling
Sally W. Harmeling

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